PE-TXD 144



Phelps Dodge Copper Products Company, PO Box 20000, El Paso, Texas 79998
Phelps Dodge Refining Coporation, PO Box 20001, El Paso, Texas 79998 (915) 775-8807 FAX (915) 775-8327

HAND DELIVERED

August 3, 1998

Mr. Dois D. Webb, P.E. Mechanical Section, New Source Review Permits Division Texas Natural Resource Conservation Commission P.O. Box 13087 Austin, Texas 78711-3087

Re:

Permit Application/ Permit Amendment Permit No. 8647
Phelps Dodge El Paso Refinery/El Paso, El Paso County/Account ID No. EE-0067-L

Dear Mr. Webb:

Enclosed is a "Form PI-1, General Application-Air Quality Permit" dated August 3, 1998 to update our existing permit application identified as an amendment to Permit No. 8647. This application was originally submitted last fall to permit existing operations at Phelps Dodge El Paso Refinery.

Additional information for the updated application will be submitted around November 1, 1998. This additional information will include information regarding replacement or upgrading of a wet scrubber in the Copper Sulfate Plant, revisions to the Table 1(a) emission rates for the chlorine scrubber and the anode shaft furnaces and associated baghouses, and addition of standby power generators to the application. Changes in baghouse operation and stack configuration at the anode furnaces will be provided.

Revised modeling will be conducted based on the changes in the permit application described above. Also, revised modeling will be conducted based on the additional furnace to be constructed at the Phelps Dodge El Paso Rod Mill and the option chosen to address carbon monoxide and copper emissions at the El Paso Rod Mill. A separate PI-1 form is being submitted today to update an existing permit application for the El Paso Rod Mill identified as Permit No. 36726/890. Completed modeling will be included with the submission of additional information around November 1.

The submittal of additional information around November 1 will address your June 3, 1998 request for additional information regarding this same permit application.

We look forward to completing this review. If you have any questions or comments regarding the proposed schedule for submission, please contact Ms. Ann Allen in our Refinery Environmental Department at 915-775-8822.

Sincerely,

Emesto Arriola

Manager, Phelps Dodge Refining Corporation

Enclosure

Cc: Mr. Archie Clouse, Air Program Manager, TNRCC Region 6, El Paso

Mr. Jesus Reynoso, Program Supervisor, El Paso City-County Health & Environmental District, El Paso

EPA Region 6, New Source Review Program, Dallas



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION FORM PI-1, GENERAL APPLICATION -- AIR QUALITY PERMIT -- (Page 1 of 2)

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•Is CONFIDENTIAL information being submitted with this application?

A PERMIT TO CONSTRUCT MUST BE APPROVED BEFORE ANY ACTUAL WORK IS BEGUN ON THE FACILITY. This is not a stand alone document. Please refer to the "Form Pl-1, Permit Application Instructions" manual (Instructions) for specific details to complete this application. Please print or type all information. All information requested herein must be completed and submitted before public notification procedures may be authorized. Please contact the CORE Section of the New Source Review Division with any questions at 512 239-1240 (FAX No. 512 239-1300). Written inquiries may be addressed to: Texas Natural Resource Conservation Commission, Office of Air Quality, New Source Review Division (MC-162), P.O. Box 13087, Austin TX 78711-3087.

[]-YES [x]-NO

		If YES, is each "confidential" page so marked in big red letters?	[]-YES []-NO
		•Has a CORE checklist been attached to this application?	[x]-YES []-NO
		•Is this application in response to or related in any way to a	[]-YES [x]-NO.
- 1		Notice of Violation at this location?	[]-1E3 [X]-NO.
- 1		If YES, date of Notice of Violation:	_
- 1		Also, if YES, pursuant to Rule:	
- 1		Please furnish the following information pertaining to this facility SITE: 1. Please estimate the net number of new jobs which will be created in the	so community as a result of the
- 1		operation of the facility authorized by this application:	le community as a result of the
- 1		operation of the facility authorized by this application:	
		Name of elected State Senator: Eliot Shapleigh	
- 1		3. Name of elected State Representative: Norma Chavez Please furnish the following information pertaining to Compliance History:	
- 1		Submit a 5-year Compliance History in accordance with 30 Texas Admir	sistratCode (TAC) Chapter 166 Sections
- 1	1	116.120-116.126 for all facilities classified in Sections V.C and V.D of For	m Pl-1 helow
	8	116.120-116.126 for all facilities classified in Sections v.C and v.D of For	III 1 - 1 Below.
1			
	TVDE	OF APPLICATION: []-CONSTRUCTION PERMIT [X]-AMENDMENT, Pe	rmit No. 8647
١.	IYPE	[]-FLEXIBLE PERMIT []-FLEXIBLE PERMIT.	AMENDMENT
	Δ	PERMIT ISSUED TO: Phelps Dodge Refinery	
		[Entity legally responsible for permit; i.e., Owner	r or Operator of the facility]
		Permittee's Texas State Comptroller's Tax ID No.: 1-13-1816885-0	in Comment in
		Permittee's address (Person, Title, Address): Ernesto Arriola, Manager Phelps Dodge Refin	ing Corporation,
		P.O. Box 20001, El Paso, Texas 79998	75 - 8802 FAX: ()
		Permittee's Technical Contact (Person, Title, Address): Ann Allen, Environmental Engineer	r, Phelps Dodge Refining Corporation,
		D O Roy 20001 El Paso Texas 79998	
		phone: (91	5) 775 - 8822 FAX: (<u>915</u>) 775 - 8342
	В.	OWNER OF FACILITY: Phelps Dodge Corporation Id different from permittee, include names of proprietor general part	perisi if applicable
		Owner's Town State Comptroller's Tay ID No : N/A	
		Owner's address (Person, Title, Address): Phelps Dodge Corporation, 2600 N. Central Av	e., Phoenix, Arizona 85004-3014
	_		
	C.	PRINCIPAL COMPANY PRODUCT OR BUSINESS: Electrolytic copper refining	
	C.		Plant SIC Code: 3331
11		PRINCIPAL COMPANY PRODUCT OR BUSINESS: Electrolytic copper refining	
11.	. FAC	PRINCIPAL COMPANY PRODUCT OR BUSINESS: Electrolytic copper refining ELITY PHYSICAL LOCATION: Name of plant or site: El Paso Refinery	
11.	. FAC A. B.	PRINCIPAL COMPANY PRODUCT OR BUSINESS: Electrolytic copper refining EILITY PHYSICAL LOCATION: Name of plant or site: El Paso Refinery Street Address: 6999 North Loop	Plant SIC Code: 3331
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FORM PI-1, GENERAL APPLICATION -- AIR QUALITY PERMIT

I. S	SUBMIT THE FOLLOWING GENERAL INFORMATION:
Α	A. Submit a current area map as specified in the Instructions. Are any schools located within 3000 feet of this facility? []-YES [X]-NO.
Р	Submit a plot plan of the plant property as specified in the Instructions.
č	Submit emission data, including fugitive emissions and stack parameters, on Table 1(a).
	Attach emission calculations and information showing how emissions were determined.
	See Instructions for further details. Submit an analysis of Source Reduction Alternatives and Best Available Control Technology, including the estimated installed
L	capital and operating costs for all source reduction and abatement equipment associated with the facility. See Instructions
	for further details
ıŕ	to fulfille details.
-	E. Franchise Tax. Is your company in good standing with the State Comptroller's Office? See
1	Instructions if you are not a corporation or for further information. [x]-YES []-NO.
1	explanation why fee is not required. (See §116.141.)
L	
(G. Please submit actual emissions (tons per year) for the last two (2) years to determine federal applicability. H. Are there any exemptions or grandfathered units related to this permit that you wish to roll into the permit or amendment at
r	this time? [x] Yes [] No
	Provide information on these units.
SE 3	SUBMIT (A) PROCESS FLOW DIAGRAM, (B) PROCESS DESCRIPTION AND (C) MATERIAL BALANCE AS SPECIFIED IN THE
II. §	INSTRUCTIONS (see Instructions concerning submittal of confidential information.)
111.	GENERAL APPLICATION REQUIREMENTS: Submit itemized information and/or analysis that will demonstrate that all general
	application requirements as specified in 30 TAC Chapter 116, §116.111 are met. Each requirement in §116.111 must be addressed in this application. See Instructions for further details. Atmospheric dispersion modeling may be required as part
	of the air quality impact analysis per §116.111(9).
	Is this facility a MAJOR SOURCE/MODIFICATION/RECONSTRUCTION with regard to one of the following:
	1. §116.111(7) - Nonattainment []-YES [X]-NO
	2. §116.111(8) - Prevention of Significant Deterioration []-YES [X]-NO. 3. FCAA §112(b) - Hazardous Air Pollutants (HAPs) []-YES [X]-NO.
	Does a MACT standard in 40 CFR Chapter 63 apply to this facility? []-YES [X]-NO.
	Is this facility located at a major source as defined in 30 TAC Chapter 122? [X]-YES []-NO.
ıx.	APPEAL PROCESS: Commission §116.114(a)(3) should be consulted for the procedure to be used to appeal the failure of the agency to
	process an application within the prescribed time limits.
1	process an application within the presented time immest
x.	A COPY OF THIS APPLICATION AND ALL ATTACHMENTS MUST BE SENT by the applicant to the EPA Region 6 office in
	Dallas if PSD or Nonattainment Review is applicable in any form, the appropriate TNRCC Regional Office and to any local and
	pollution control program having jurisdiction. Copies of the application were sent to:
	EPA Region 6 Office in Dallas [X]-YES []-Not applicable. TNRCC Regional Office sent to: (city) TNRCC Region 6- El Paso
	Copies sent to these local programs: 1. El Paso City-County Health and Environmental District
	[]-NOT APPLICABLE. 2.
	**** ***** PE 0 1
XI.	§116.110(d). PE Seal. Is the estimated capital cost of the project for which application is made greater than \$2 million dollars? [X]-YES []-NC
	if YES, application must be submitted under seal of a Texas registered Professional Engineer, unless exemption is claimed
	pursuant to the Texas Engineering Practice Act.
	[] - Exemption is claimed pursuant to Section of the TEPA.
VII.	The International Boundary Water Commission (IBWC) wishes to be notified of any new construction within 100 kilometers
XII.	of the Rio Grande River. For the mailing address of the IBWC, please refer to the PI-1 instructions.
	I. Ernesto Arriola Manager Phelps Dodge Refining Corporation
III.	
	state that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge
	and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in
	any way violate any provision of the Texas Health & Safety Code (THSC), Chapter 382, Texas Clean Air Act, as amended,
	or any of the air quality Rules and Regulations of the Texas Natural Resource Conservation Commission or any local governmental ordinance or resolution enacted pursuant to the Texas Clean Air Act. I further state that I have read and
	understand Section 382.091, THSC, which defines CRIMINAL OFFENSES for certain violations, including intentionally or
	distriction occion sold the material statements or conscentations in this application, and Costion

knowingly making or causing to be made talse material statements or representations in this application, and Section 382.092, THSC, pertaining to CRIMINAL ENALTIES.

SIGNATURE

SIGNATURE IN INK IS REQUIRED.



Phelps Dodge Copper Products Company, PO Box 20000, El Paso, Texas 79998 El Paso Operations Phelps Dodge Refining Coporation, PO Box 20001, El Paso, Texas 79998 (915) 775-8807 FAX (915) 775-8327

HAND DELIVERED

August 3, 1998

Mr. Dois D. Webb, P.E. Mechanical Section, New Source Review Permits Division Texas Natural Resource Conservation Commission P.O. Box 13087 Austin, Texas 78711-3087



Re:

Permit Application/ Permit No. 36726/P890

Phelps Dodge El Paso Rod Mill/El Paso, El Paso County/Account ID No. EE-0066-N

Dear Mr. Webb:

Enclosed is a "Form PI-1, General Application-Air Quality Permit" dated August 3, 1998 to update our existing permit application identified as Permit No. 36726/P890. This application was originally submitted to permit an existing shaft furnace at Phelps Dodge El Paso Rod Mill.

The updated application enclosed will permit a second shaft furnace at the El Paso Rod Mill in addition to the existing shaft furnace. The two furnaces will be operated alternately.

Additional information for the updated application will be submitted around November 1, 1998. This additional information will include information regarding the second shaft furnace to be constructed and the proposed option for addressing carbon monoxide and copper emissions from the existing furnace and the second shaft furnace.

Revised modeling will be conducted based on the additional furnace and the option chosen to address carbon monoxide and copper emissions. Completed modeling will be included with the submission of additional information around November 1.

The submittal of additional information around November 1 will address your June 3, 1998 request for additional information regarding this same permit application.

We look forward to completing this review. If you have any questions or comments regarding the proposed schedule for submission, please contact Ms. Ann Allen in our Refinery Environmental Department at 915-775-8822.

Sincerely,

Jon W. Griffith

Manager, Phelps Dodge Copper Products Company

Enclosure

Mr. Archie Clouse, Air Program Manager, TNRCC Region 6, El Paso Cc:

Mr. Jesus Reynoso, Program Supervisor, El Paso City-County Health & Environmental District, El Paso

EPA Region 6, New Source Review Program, Dallas



TEXAS NATURAL RESOURCE CONSERVATION COMMISSION FORM PI-1, GENERAL APPLICATION -- AIR QUALITY PERMIT -- (Page 1 of 2)

A PERMIT TO CONSTRUCT MUST BE APPROVED BEFORE ANY ACTUAL WORK IS BEGUN ON THE FACILITY. This is not a stand alone document. Please refer to the "Form PI-1, Permit Application Instructions" manual (Instructions) for specific details to complete this application. Please print or type all information. All information requested herein must be completed and submitted before public notification procedures may be authorized. Please contact the CORE Section of the New Source Review Division with any questions at 512 239-1240 (FAX No. 512 239-1300). Written inquiries may be addressed to: Texas Natural Resource Conservation Commission, Office of Air Quality, New Source Review Division (MC-162), P.O. Box 13087, Austin TX 78711-3087.

	11		1
	1	•Is CONFIDENTIAL information being submitted with this application? []-YES [x]-NO	
	1	If YES, is each "confidential" page so marked in big red letters? []-YES []-NO	
	1	•Has a CORE checklist been attached to this application? [x]-YES []-NO	
		•Is this application in response to or related in any way to a	ı
		Notice of Violation at this location? []-YES [x]-NO.	
	H	If YES, date of Notice of Violation:	
		Also, if YES, pursuant to Rule:	
	II		
	1	Please furnish the following information pertaining to this facility SITE:	
		1. Please estimate the net number of new jobs which will be created in the community as a result of the	
		operation of the facility authorized by this application: 0	
		Name of elected State Senator: Eliot Shapleigh Name of elected State Representative: Norma Chavez	
	1	3. Name of elected State Representative: Norma Chavez	
		Please furnish the following information pertaining to Compliance History:	
	II	Submit a 5-year Compliance History in accordance with 30 Texas AdministratCode (TAC) Chapter 166, Sections	
		116.120-116.126 for all facilities classified in Sections V.C and V.D of Form PI-1 below.	
		RESOLVED CONTROL OF SOLVE CONTROL OF SOLVED CONT	
	TVPF	OF APPLICATION: [x]-CONSTRUCTION PERMIT []-AMENDMENT, Permit No.	
•		[]-FLEXIBLE PERMIT []-FLEXIBLE PERMIT AMENDMENT	-
	Α.	PERMIT ISSUED TO:	
		[Entity legally responsible for permit; i.e., Owner or Operator of the facility]	_
		Permittee's Texas State Comptroller's Tax ID No.: 1-13-2575365-2	
		Permittee's address (Person, Title, Address): Jon W. Griffith, Manager Phelps Dodge Copper Products Company,	
		P.O. Box 20200, El Paso, Texas 79998	_
		phone: (915) 775 - 8855 FAX: () Permittee's Technical Contact (Person, Title, Address): David L. Fisher, Environmental Coordinator, Phelps Dodge	
		Copper Products Company, P.O. Box 20200, El Paso, Texas 79998	_
		phone: (915) 775 - 8349 FAX: (915) 775 - 8354	-
	В.	OWNER OF FACILITY: Phelps Dodge Corporation	=
		Owner's Texas State Comptroller's Tax ID No.: N/A	
		Owner's address (Person, Title, Address): Phelps Dodge Corporation, 2600 N. Central Ave., Phoenix, Arizona 85004-3014	_
		Owner's address it crossing they Address, I means bedge despotation, 2000 N. dentral Ave., Thornix, Alizona dood-3014	
	C.	PRINCIPAL COMPANY PRODUCT OR BUSINESS: copper rod and wire	
		Plant SIC Code: 3351	
22			
11.	FAC	LITY PHYSICAL LOCATION: Name of plant or site: El Paso Rod Mill	
	Ř.	Street Address: 897 Hawkins	_
		Mearest City El Paso Site 7 Code: 70015	-
	D.	Latitude: 31 '46 '00 "N Longitude: 106 °23 '30 "W (must be to nearest second)	=
	E.	Plant Site TNRCC Air Quality Account Number: <u>EE - 0066 - N</u>	
- 41			
Ш.		LITY TYPE AND OPERATING SCHEDULE:	
	A.	Name of facility to be permitted: El Paso Rod Mill Shaft Furnaces	_
	B.	Facility Type (Check One): [X] Permanent, [] Portable. Facility Operating Schedule: (24)Hours/day; (7)Days/week; (52)Weeks/year	
	C.	(_) Seasonal - explain:	
	D.	Start Dates (Proposed/Actual): Construction: 1 / 1 / 81 (P/A) A Operation: 11 / 18 / 82 (P/A) A	_
		Construction: 6 / 1 / 99 (P/A) P Operation: 12 / 1 / 00 (P/A) P	
V.	FAC	LITY CLASSIFICATION (Check only one block):	
	A.	[x] New Permitted Facility - New grass roots Facility at this location.	
		New Permitted Facility - Modification of existing non-permitted Facility.	
	C.	[] Amendment to Permitted Facility. Permit No(s)	ay
	D.	[] Change in Location of Permitted Facility. Permit No(s)	00
		Location of Present Facility:	_
		ARI IANGE HISTORY (See attached Supplemental Information Chart)	
٧	. ÇU	MPLIANCE HISTORY (See attached Supplemental Information Sheet): [] Exemption claimed under §116.121, or	
	B.	[x] Existing Site = > 5 years old. TNRCC will compile Compliance History, or	
	Ċ.	[] New Site (This is a new grass roots site with no operating history); does applicant have similar facilities in Texas?	
		[]-YES []-NO*, or	
	D.	1 Existing Site < 5 years old: does applicant have similar facilities in Texas? 1-YFS 1-NO*	
		Note: If either "C" or "D" is NO, attach one of the following:	
		a. [] Compliance History for similar sites in other States. If none, then: b. [] Compliance History as required by 30 TAC Chapter 116, §116.122(b)	
		2. 1 , 25p	

FORM PL1 GENERAL APPLICATION

FUR	WI FI-1, GLIVERAL AFFEIDATION	- AIN GOALITT PENIVIT	(rage 2 or 2)
E	UBMIT THE FOLLOWING GENERAL INFORMA. Submit a current area map as specified in the Ins Are any schools located within 3000 feet of this. Submit a plot plan of the plant property as speci. Submit emission data, including fugitive emission Attach emission calculations and information sho See Instructions for further details. Submit an analysis of Source Reduction Alterna operating costs for all source reduction and abat	structions. facility? []-YES [X]-NO. fied in the Instructions. ns and stack parameters, on Table 1(a). powing how emissions were determined. etives and Best Available Control Technol	
	F. Permit Fee. Enclose required fee, explanation why fee is not require	y in good standing with the Soration or for further information fee certification and estimated ed. (See §116.141.)	State Comptroller's Office? See on. [x]-YES []-NO. capital cost (Table 30); or furnish
٢	 Please submit actual emissions (tons per yet). Are there any exemptions or grandfathered units Yes [X] No Provide information on these units. 	related to this permit that you wish to rol	Il into the permit or amendment at this time? []
VII. S	UBMIT (A) PROCESS FLOW DIAGRAM, (B) F NSTRUCTIONS (see Instructions concerning s	PROCESS DESCRIPTION AND (C) M. submittal of confidential information.)	ATERIAL BALANCE AS SPECIFIED IN THE
VIII.	application requirements as specified in 30	O TAC Chapter 116, §116.111 are mons for further details. Atmospheric di 1(9). ATION/RECONSTRUCTION with regardent Deterioration [X ants (HAPs)] 63 apply to this facility? []-YES [X]-NO]-YES []-NO.]-YES [X]-NO.]-YES [X]-NO.
(APPEAL PROCESS: commission §116.114(a)(3) should be cons rocess an application within the prescribe		d to appeal the failure of the agency to
X.	if PSD or Nonattainment Review is applicab control program having jurisdiction. Copies EPA Region 6 Office in Dallas TNRCC Regional Office sent to: (city) Copies sent to these local programs:	le in any form, the appropriate TNRCC of the application were sent to: [X] 1-YES [] 1-Not applicable.	applicant to the EPA Region 6 office in Dallas Regional Office and to any local air pollution vironmental District
XI.	§116.110(d). PE Seal.	for which application is made greater	than \$2 million dollars? [X 1-YFS [1-NO

if YES, application must be submitted under seal of a Texas registered Professional Engineer, unless exemption is claimed pursuant to the Texas Engineering Practice Act.

[] - Exemption is claimed pursuant to Section of the TEPA.

The International Boundary Water Commission (IBWC) wishes to be notified of any new construction within 100 kilometers of XII. the Rio Grande River. For the mailing address of the IBWC, please refer to the PI-1 instructions.

XIII. I, Jon W. Griffith [Name - Please print or type] Manager Phelps Dodge Copper Products Company

[Title: Owner, Plant Manager, President, Vice-President, Environmental Director, etc.]

state that I have knowledge of the facts herein set forth and that the same are true and correct to the best of my knowledge and belief. I further state that to the best of my knowledge and belief, the project for which application is made will not in any way violate any provision of the Texas Health & Safety Code (THSC), Chapter 382, Texas Clean Air Act, as amended, or any of the air quality Rules and Regulations of the Texas Natural Resource Conservation Commission or any local governmental ordinance or resolution enacted pursuant to the Texas Clean Air Act. I further state that I have read and understand Section 382.091, THSC, which defines CRIMINAL OFFENSES for certain violations, including intentionally or knowingly making or causing to be made false material statements or representations in this application, and Section 382.092, THSC, pertaining to CRIMINAL PENALTIES.

SIGNATURE

ORIGINAL SIGNATURE IN INK IS REQUIRED.



US EPA, DALLAS, TX ASSOCIATE DIRECTOR 11 0000 466273

15 DEEnelps Dodge Refining Corporation
897 Hawkins Blvd., El Paso, TX 79915 (915) 782-7301 • FAX (915) 782-7789
COMPLIANCE ASSURANCE OF MENT DIV.

CERTIFIED MAIL - ARTICLE NUMBER 7011 3500 0002 2424 4281
RETURN RECEIPT REQUESTED

December 15, 2015

US EPA, Region 6 Air Enforcement 6EN-A 1445 Ross Ave, Ste. 1200 Dallas, Texas 75202

Re:

Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill

Account No. EE-0067-L

Title V Operating Permit No. O-1602

RN: RN100226000 CN: CN600132187

Semi-Annual Deviation Report - May 18, 2015, through November 17, 2015

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Semi-Annual Deviation Report for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not hesitate to call me at (915) 782-7353.

Sincerely,

Rajesh Bhakta

Sr. Environmental Engineer

Enclosures:

Semi-Annual Deviation Report - May 2015, through November 2015

Form OP-CR01



Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

		A STATE OF THE STA					
I. IDENTIFYING	INFORMATION						
RN: 100226000	CN: 6	500132179)		Account No	o.: EE-00	67-L
Permit No.: O1602			Project N	lo.: 1602			200 N 25-20
Area Name: Phelps Doo	lge El Paso Operati	ons	Company	Name: Phe	elps Dodge C	Corporatio	on
II. CERTIFICATIO	N TYPE (Please m	ark the a	ppropriat	e box)	1.0 -1 .00 to		<u> </u>
Responsible Official			☐ Duly	Authorized	l Representa	itive	
III. SUBMITTAL TY	PE (Please mark t	he approp					pted per form
SOP/TOP Initial Per	At State of the St	(2)		it Applicatio			
GOP Initial Permit A	pplication	☐ Permi	t Revision	, Renewal, c	or Reopening	g	
Other: <u>Semi Annual</u>	Deviation Report						
IV. CERTIFICATION	N OF TRUTH						7
This certification doe information for refer I, John P. Quinn (Certifier No.	rence only.			tify that I ar	m the <u>R</u>	RO	
and that, based on informated during the time per Note: Enter EITHER and completed. The certifical	mation and belief for riod or on the speci Time Period OR Spe	ormed afte ific date(s	s) below, a re(s) for ea	re true, accu ach certificat	the stateme irate, and co	mplete:	nformation
	ion is not valia wii	thout aoci	ımentatıo	n date(s).			
Time Period: From	Start Dat	to	to		End Date		
Specific Dates: 5/1	18/15- 11/17/15 (Se ate 1 Date	emi Annu	al Deviatio Date 3	on Report) Date 4		ete5	Date 6
Signature: bh	n.P. Que	enic)	Signatu	re Date: /s	1/15/1	5
Title: <u>General Manager</u>							



Texas Commission on Environmental Quality Federal Operating Permit Deviation Report Form Form Dev Rep (Part 1)

							Number	CINODO 1321/9
Area Name	Phelps Do	Phelps Dodge El Paso Operations	perations	5 %				EE-0067-L
Report Period 0: Start Date	05/18/2015	Report Period End Date	11/17/2015		Operating Permit Number	01602	Report Submittal Date	12/15/2015
	Ope	Operating Permit Requirement for Which Deviations	Requiremen	nt for Which	Deviations	are Being Reported	orted	
ID Number	e	Term &		Regulatory	Type of	SOP or GOP	Monitoring	Monitoring
Unit ID	Group ID	No.	Pollutant	Citation	Requirement	t Index Number	Method	
8	RM EP01A	FOP	PM	NSR Permit	Permit	N/A	NSR Permit	Permit
Papric Filter		Special		#36/26,	Standard		#36726,	requires daily
Eagnouse		Condition 9		Special			Special	monitoring
(Furnace No. 2)				Condition 9			Condition 14	4 but Permittee
				as defined				monitors
		W 1 72 P		by Special				continuously
				Condition				
				14				

Dev	STEERS		Devia	Deviation Period	iod		
No.	No.		Start		End	No. of	
		Date	Time	Date	Time	Dev	Cause of Deviation
_	N/A	7/08/	21:50	7/08/	21:58	1	At approximately 21:50, the
		2015		2015			differential pressure had
							inches for a few seconds
					Barrier St		during the 8 minute manual
							cleaning cycle. Upon further
							investigation, it was
							determined that the draft set
							point was fixed at 0.3.
							Having the draft set at 0.3, in
							conjunction with not having
							the cleaning cycle on
					Total Care		Automatic caused the blower
							to work at a maximum of 60

TCEQ-10101 [04/09] Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Pe
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1
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-

AIR CO/RN100226000/RP

	com supporting time deviation reports	C					
YES NO	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence	Is there a Part 3 Miscellane	_	Total Deviations:	Total D		
		not allowing emissions to enter the RTO.					
		because the damper closes		7			
		this 8 minutes, no emission					
		until the cleaning cycle was					
		differential pressure to rise					
y.		Hz (100%), thus causing the					

TCEQ-10101 [04/09] Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

| | |



Federal Operating Permit Deviation Report Form Texas Commission on Environmental Quality Form Dev Rep (Part 3) OPTIONAL

Miscellaneous Monitoring and Credible Evidence Submittal

Deviation Item Number	Monitoring Method/ Evidence Reference	Monitoring/Evidence Results supporting Compliance Status	Additional Materials attached? Y/N
_	Furnace/RTO operational parameters	Pressure gauges are installed, calibrated and maintained to monitor and record the differential	Z
		pressure. The differential pressure is recorded on a	

AI IAI/CO



H0000486273

Phelps Dodge Refining Corporation
897 Hawkins Blvd., El Paso, TX 79915 • (915) 782-7301 • FAX (915) 782-7789

CERTIFIED MAIL - ARTICLE NUMBER 7011 3500 0002 2424 4182 RETURN RECEIPT REQUESTED

RECEIVE

JUN 15 2015

June 12, 2015

Ain Toxics & Inspection Coordination Branc 6EN-A

US EPA, Region 6 Air Enforcement 6EN-A 1445 Ross Ave, Ste. 1200 Dallas, Texas 75202

Re:

Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill

Account No. EE-0067-L

Title V Operating Permit No. O-1602

RN: RN100226000 CN: CN600132187

Annual Compliance Certification - May 18, 2014, through May 17, 2015

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Annual Compliance Certification (PCC) for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not hesitate to call me at (915) 782-7353.

Sincerely,
Rays Block

Rajesh Bhakta

Sr. Environmental Engineer

Enclosures:

Annual Compliance Certification (PCC) - May 2014, through May 2015

Form OP-CR01



Texas Commission on Environmental Quality Federal Operating Permit Form Permit Compliance Certification – PCC (Part 1)

Permit Holder Name	Phelps Dodge Refining Corporation	Customer Number	CN600132179
Area Name	El Paso Refinery and Rod Mill	Account Number	EE-0067-L
Operating Permit Number	O - 1602	Report Submittal Date	6/12/2015
Certification Period Start Date	5/18/2014	End Date	5/17/2015

I. Certification of Continuous Compliance with Permit Terms and Conditions	Resp	onse:
(Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	\boxtimes	

II. Su	mmary of Deviations	Resp	onse:
(Indica questic	te response by placing a 'x' in the appropriate column for each of the following ons)	Yes	No
A.	Were there any deviations from any permit requirements during the Certification Period that have <i>previously</i> been reported to the agency? If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal. Important Note: If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.		
B.	Were there any deviations from any terms or conditions of the permit during the Certification Period that are <i>currently</i> being submitted to the agency? If the answer to this question is 'Yes', please include the relevant reports along with this page.		

TCEQ-10490 [08/12] Page 1 of 1 Form PCC: This form for use by Federal Operating Permit holders and may be revised periodically.



Texas Commission on Environmental Quality Form OP-CRO1 - Instructions Certification by Responsible Official

General:

Title 30 Texas Administrative Code § 122.132(e) [30 TAC § 122.132(e)] (relating to "Application and Required Information for Initial Permit Issuance, Reopening, Renewal, or General Operating Permits") and 30 TAC § 122.165 (relating to "Certification by a Responsible Official") require that a Responsible Official (RO), or appropriate designee, shall certify all documents submitted to the Texas Commission on Environmental Quality (TCEQ) in support of a federal operating permit (FOP), or that are required by 30 TAC Chapter 122 or by an operating permit condition(s). This Form OP-CRO1 (Certification by Responsible Official) satisfies these certification requirements in a manner consistent with 30 TAC § 122.165.

(Certification by the authorized Designated Representative (DR), or Alternate Designated Representative (ADR), apply to the Acid Rain or CAIR, Program sources only and is executed on OP-CRO1, page 2 [Certification by Designated Representative]. The DR or ADR shall certify application information for sites with one or more units subject to the Acid Rain or CAIR Programs and shall certify application information and reports as an RO. This OP-CRO1, page 2 [Certification by Designated Representative] satisfies these certification requirements in a manner consistent with 30 TAC § 122.165.)

All initial, revision, and renewal FOP applications, as well as all post-issuance submittals requiring certification must be accompanied by Form OP-CRO1. However, while a site operating permit (SOP) or temporary operating permit (TOP) is undergoing technical review, application updates (e.g., administrative changes, responses to a TCEQ permit application deficiency notice, or request for information) do <u>not</u> require a Form OP-CRO1 to be included with each submittal. This certification will be requested at the time of the Working Draft Permit review, and any required certifications must be included with the applicant's response to the review of the Working Draft Permit. (Refer to the Working Draft Permit Review Fact Sheet at www.tceq.texas.gov/permitting/air/titlev/site/sop_wdp_factsheet.html for additional details.)

Likewise, updates to general operating permit (GOP) applications undergoing technical review do not require a Form OP-CRO1 to be included with each submittal and need only be certified prior to being granted an authorization to operate under the GOP by the TCEQ. All SOP application updates submitted after public notice authorization or start of public announcement, or GOP application updates submitted after being granted authorization to operate, must be accompanied by a completed Form OP-CRO1.

All materials related to public notice certification must also be certified; including the original tearsheet(s), publisher's affidavit(s), and the "Public Notice Verification Form/Air Permits." Dates of these submittals should be included on the certification form submitted immediately following the close of the public comment period. (Specific details regarding these submittals and the certification procedure are included in the Public Notice Authorization Package sent to applicants with draft FOPs)

The dates of each application update submittal being certified may be entered on a Form OP-CRO1. (Up to eight submittal dates may be entered on each form.) Alternatively, a single Form OP-CRO1 may be used to certify a range of dates (time period). Note that the time period option may <u>not</u> be used if "Submittal Type" in Section III is "Other."

If the RO authority is being delegated to a DAR, a completed and signed Form OP-DEL entitled "Delegation of Responsible Official" must also be submitted in order for the DAR certification to be valid. Form OP-DEL need not be included in subsequent submittals unless there is a new appointment or an administrative information change regarding the DAR.

This form must bear the signature of the RO, DAR, DR, or ADR and a signature date in order for the certification to be valid. The Signature Date, which will be used to validate signature authority of the RO, DAR, DR, or ADR, must be on or after the effective date of the RO, DAR, DR, or ADR certifying to the change. Signature stamps can be accepted in place of an original signature. Faxes and photocopies can be accepted in place of an original certification form; however, a follow-up submittal of the original signed certification form is requested. This certification does not extend to information which is designated by the TCEQ as "information for reference only." Please refer to the TCEQ guidance entitled "Applying for an Initial Title V permit" or "Responsible Official Certifications" for additional information.

IMPORTANT: At any time after the initial permit application submittal when a new RO, DR, or ADR is appointed, or there is a change to the administrative information regarding the RO, DR, or ADR (e.g., address, phone number, title), the applicant must submit a completed <u>Form OP-CRO2</u> "Change of Responsible Official Information," to the TCEQ Air Permits Division for notification purposes. At any time after the initial permit application submittal that a new DAR is appointed, or there is a change to the administrative information regarding the DAR, the applicant must submit a completed <u>Form OP-DEL</u> to the TCEQ Air Permits Division for notification purposes.

Specific:

I. IDENTIFYING INFORMATION

- RN: Enter the regulated entity reference number (RNXXXXXXXXX) for the site. This number is assigned by the TCEQ as part of the central registry process. If a regulated entity reference number has not yet been assigned, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space.
- CN: Enter the Customer Reference Number (CNXXXXXXXXX). This number is assigned by the TCEQ as part of the central registry process. If a customer reference number has not yet been assigned, leave this space blank. Do not enter permit numbers, project numbers, account numbers, etc. in this space.
- o <u>Account No</u>: Enter the primary TCEQ account number (*XX-XXXX-X*) for the site if assigned. (Some newer facilities will not have this number, in which case the space should be left blank.)
- Permit No.: Enter the operating permit number, if assigned (OXXXXX). If this is the <u>first</u> submittal regarding an <u>initial</u> application for an SOP, a TOP, or a GOP, the permit number will be assigned upon receipt by the TCEQ. In this case, enter "TBA" for "to be assigned." The permit number will appear on all correspondence from the TCEQ regarding the application.
- Project No.: Enter the project number that identifies this specific permitting action, if assigned (XXXX). If this is the <u>first</u> submittal regarding an initial, revision, or renewal application submittal (SOP, TOP, or GOP), the project number will be assigned upon receipt by the TCEQ. In this case, enter "TBA" for "to be assigned." The project number will appear on all correspondence from the TCEQ regarding the application.

- O <u>Area Name</u>: Enter the area name used in the "Application Area Information" section of the most recent Form OP-1 (Site Information Summary) submitted with the application (maximum 50 characters). If there is only one permit at the site, the area name is the same as the site name.
- O <u>Company Name</u>: Enter the name of the company for which the application is being submitted (maximum 50 characters). The company name on this form should be the same as the Customer Name listed in Section II of the TCEQ Core Data Form.

II. CERTIFICATION TYPE

Indicate the type of certification by marking the appropriate box or boxes.

- Responsible Official: Select this option if certification is being made by the RO.
- O <u>Duly Authorized Representative</u>: Select this option if certification is being made by the DAR. The DAR must have been previously designated using Form OP-DEL (Delegation of Responsible Official), or a completed OP-DEL must accompany the Form OP-CRO1

III. SUBMITTAL TYPE

Indicate the type of attached submittal by entering an "X" in the box next to <u>one</u> of the following options:

- <u>SOP/TOP Initial Permit Application</u>: Select the option if this certification accompanies the <u>first</u> submittal regarding an initial SOP or TOP application.
- GOP Initial Permit Application: Select this option if this certification accompanies the <u>first</u> submittal regarding an initial GOP application.
- Permit Revision, Renewal, or Reopening: Select this option if this certification accompanies the first submittal regarding a revision, reopening, or renewal application for an SOP, TOP, or GOP.
- O <u>Update to Permit Application</u>: Select this option if this certification addresses updates to any permit application (initial, revision, renewal) currently under review. Application updates include administrative changes, responses to deficiency notices or requests for information from the reviewer, working draft permit comments, public notice information, or other follow-up information submitted prior to issuance.
- Other: Select this option if the submittal is not one of the types listed above. Identify the type of submittal in the space provided (maximum 25 characters). Examples include, but are not limited to:
 - Annual Compliance Certification
 - Progress Report
 - Deviation Report
 - Monitoring Report
 - Test Report

IV. CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

Certifier Name: Print or type the name of the RO or DAR (maximum 25 characters).

Certifier Type: Enter the type of signature authority held by the certifier, "RO" or "DAR."

<u>Documentation Dates</u>: Enter <u>either</u> a Time Period <u>or</u> Specific Date(s) as defined below. These dates will be used to link the Form OP-CRO1 to the documentation being certified. Do not enter signature dates. *This section must be completed. The certification is not valid without documentation date(s).* Note that all submittals containing application-related information (including by fax or e-mail) must be certified.

<u>Time Period</u>: Enter the start and end dates of the time period that contains all submitted application documentation (*MM-DD-YYYY*) that was not previously certified. This option may only be used when:

- The "Submittal Type" is 'Update to Permit Application' and there are multiple uncertified submittals; or
- A submittal package has multiple dates recorded in the documentation.

Note: The Time Period option may only be used when the "Submittal Type" is "Update to Permit Application" and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is "Other."

Specific Dates: Enter a date or date(s) (*MM-DD-YYYY*) for each application submittal that was not previously certified. If a submittal package has multiple dates recorded in the documentation, each date may be listed, or the overall submittal date (e.g., cover letter date) may be listed. Please do not repeat documentation dates on multiple certifications. If more than eight (8) date spaces are needed, use multiple forms.

Signature: A signature of the RO or DAR is required. Signature stamps can be accepted in place of an original signature.

<u>Signature Date</u>: Enter the date this form was signed by the RO or DAR (*MM-DD-YYYY*). The certifier must have signature authority on this date in order for certification to be valid.

<u>Title</u>: Enter the job title of the RO or DAR.



Certification by Designated Representative For Affected Sources that are subject to the following Programs: Acid Rain, Clean Air Interstate Rule (CAIR)

Specific:

I. IDENTIFYING INFORMATION

Please use the same instructions for Section I Form OP-CRO1, Page 1.

II. CERTIFICATION TYPE

Indicate the type of certification by marking the appropriate box or boxes.

- <u>Designated Representative</u>: Select this option if this form is being used as certification by the DR.
- Alternate Designated Representative: Select this option if this form is being used as certification by the ADR.

III. PERMIT and SUBMITTAL TYPE

- o Indicate the Permit type of attached by marking the box next to the applicable option(s):
 - Acid Rain
 - CAIR
- o Indicate the Submittal type of attached by marking the box next to one of the following options:
 - Initial Permit Application
 - Update to Permit Application
 - Permit Revision or Renewal
 - Other

IV. CERTIFICATION

Certifier Name: Print or type the name of the DR or ADR (maximum 25 characters).

Certifier Type: Enter the type or types of signature authority held by the certifier as "DR," or "ADR."

Note: Enter EITHER a Time Period OR Specific Date(s) as defined below; these dates will be used to link the Form OP-CRO1, page 2 to the documentation being certified. The certification is not valid without documentation date(s). Do not enter signature dates.

<u>Documentation Dates:</u> Enter <u>either</u> a Time Period <u>or</u> Specific Date(s) as defined below. These dates will be used to link the Form OP-CRO1 to the documentation being certified. Do not enter signature dates. *This section must be completed. The certification is not valid without documentation date(s).* Note that all submittals containing application-related information (including by fax or e-mail) must be certified.

OP-CRO1 Instructions

<u>Time Period</u>: Enter the start and end dates of the time period that contains all previous and currently submitted, and as yet uncertified, documentation (*MM-DD-YYYY*). Start and end dates are allowed only when certifying updates to the permit application or when a submittal package has multiple dates recorded in the documentation. The DR or ADR must have signature authority for the entire time period indicated.

Note: The Time Period option may only be used when the "Submittal Type" is "Update to Permit Application" and there are multiple uncertified submittals; or a submittal package has multiple dates recorded in the documentation. Do not use the Time Period option if the "Submittal Type" is "Other."

Specific Dates: Enter the date(s) recorded on all previous and currently submitted, and as yet uncertified, documentation (*MM-DD-YYYY*). Multiple dates are allowed only when certifying updates to the permit application or when a submittal package has multiple dates recorded in the documentation. The DR or ADR must have signature authority for all documentation dates indicated.

<u>Signature</u>: A signature of the DR or ADR is required. Signature stamps can be accepted in place of an original signature.

<u>Signature Date</u>: Enter the date this form was signed by the DR or ADR (*MM-DD-YYYY*). This date will be used to ensure signature authority and is required in order for certification to be valid.

Title: Enter the job title of the DR or ADR.



Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMA	ATION			
RN: 100226000	CN: 6	00132187		Account No.: EE-0067-L
Permit No.: O1602			Project No.: 1602	
Area Name: El Paso Refinery and F	Rod Mill		Company Name: Ph	elps Dodge Refining Corporation
II. CERTIFICATION TYPE (Please m	ark the a	ppropriate box)	
□ Responsible Official			☐ Duly Authorize	d Representative
III. SUBMITTAL TYPE (Please	e mark t	he approp	priate box) (Only one	e response can be accepted per form)
SOP/TOP Initial Permit Applica	ation	☐ Updat	e to Permit Applicati	ion
GOP Initial Permit Application		Permi	t Revision, Renewal,	or Reopening
Other: <u>Semi Annual Deviation</u>	Report	and Annu	al Compliance Certif	ication
IV. CERTIFICATION OF TRU	ЛН			
This certification does not ext information for reference only	end to		The second secon	
I, <u>John P. Quinn</u> (Certifier Name printe	ed or tur	oed)	certify that I	(RO or DAR)
and that, based on information and dated during the time period or on Note: Enter EITHER a Time Period completed. The certification is not	the spec od OR S _I	cific date(s pecific Dat ithout doc	s) below, are true, acc te(s) for each certific numentation date(s).	curate, and complete:
Time Period: From	State Do	nte	to	End Date
			al Deviation Repor	rt) 5/18/14-5/17/15 (Annual
Signature: John P. C	Ven	mi	Signat Signat	ture Date: 6/12/15
Title: General Manager				



Texas Commission on Environmental Quality Federal Operating Permit Deviation Report Form Form Dev Rep (Part 1)

Unit ID	ID Number		Report Period Start Date	Area Name	Permit Holder Name
Group ID	ber	Oper	5/18/2014		
No.	Term &	Operating Permit Requirement for Which Deviations	Report Period End Date	Phelps Dodge El Paso Operations	Phelps Dodge Refining Corporation
Pollutant		Requiremen	5/17/2015	Paso Opera	ining Corpor
Citation	Regulatory	t for Which	Operatir Number	itions	ation
Requirement	Type of	Deviations	ng Permit		
Number	SOP or GOP	are Being Reported	01602		
Method		orted	Report Submittal Date	Account Number	Customer Number
	a Monitorina		06/12/2015	EE-0067-L	CN600132179

☐ YES NO	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	Is there a Part 3 Miscellane forn	0	Total Deviations:	Total I			
3	Deviation Situation	Cause of Deviation	Dev	Time	Date	Date Time		
edy or Mitigate	Corrective Action Taken to Remedy or Mitigate		No. of	End		Start	No.	
				riod	Deviation Period	Devia	STEERS	Dev



ECEIM

Phelps Dodge Refining Corporation
897 Hawkins Blvd., El Paso, TX 79915 • (915) 782-7301 • FAX (915) 782-7789

CERTIFIED MAIL - ARTICLE NUMBER 7011 3500 0002 2424 4090 RETURN RECEIPT REQUESTED

DEC 1 7 2014

December 15, 2014

US EPA, Region 6 Air Enforcement 6EN-A 1445 Ross Ave, Ste. 1200 Dallas, Texas 75202

Re:

Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill

Account No. EE-0067-L

Title V Operating Permit No. O-1602

RN: RN100226000 CN: CN600132187

Semi-Annual Deviation Report - May 18, 2014, through November 17, 2014

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Semi-Annual Deviation Report for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not hesitate to call me at (915) 782-7353.

Sincerely,

Rajesh Bhakta

Sr. Environmental Engineer

Karil Bluth

Enclosures:

Semi-Annual Deviation Report - May 2014, through November 2014

Form OP-CR01



Form OP-CRO1

Certification by Responsible Official

Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYI	NG INFORMAT	ION				
RN: 100226000		CN: 60013217	79		Account No.: EE-	0067-L
Permit No.: O1602			Project N	Vo.: 1602		
Area Name: Phelps	Dodge El Paso O _I	perations	Company	y Name: Phe	lps Dodge Corpora	ation
II. CERTIFICA	TION TYPE (Ple	ase mark the o	appropriat	e box)	•	201 - P. Mary (1922)
Responsible Offi	cial		☐ Duly	Authorized	Representative	
III. SUBMITTAI	L TYPE (Please n	nark the appro	priate box) (Only one	response can be a	ccepted per form
SOP/TOP Initial			The state of the property of the state of th	it Applicatio		
☐ GOP Initial Pern	nit Application	Perm	it Revision	, Renewal, o	r Reopening	
⊠ Other: <u>Semi An</u>	nual Deviation Re	port	_			7
IV. CERTIFICAT	TION OF TRUTI	H				
() () () () () () () () () ()	uinn er Name printed o	or typed)			n the <u>RO</u> (RO or	100
and that, based on indated during the time	nformation and be ne period or on the	elief formed af e specific date(ter reasona s) below, a	ble inquiry, re true, accu	the statements and	d information e:
Note: Enter EITHE completed. The certi	R a Time Period (OR Specific Do	te(s) for ea	ach certificat		
Time Period: From			to			
	Sta	rt Date			End Date	
Specific Dates <u>:</u>			ual Deviati Date 3	on Report) Date 4	 Date5	
				V:		
Signature:	hnP.Qu	um		Signatur	re Date: 19/15	/14
Гitle: <u>General Mana</u>	ger		-			

Federal Operating Permit Deviation Report Form Texas Commission on Environmental Quality Form Dev Rep (Part 1)

Permit Holder Name		Phelps Dodge Refining Corporation	ining Corpo	ration			Customer	CN600132179
		-	- 1 -				Number	0
Area Name		rneips Dodge El	I Paso Operations	ations			Account	FF-0067-1
	E14010044	1					Number	1 200 1
Report Period Start Date	5/ 10/20 14	Report Period End Date	11/17/2014		g Permit	01602	Report Submittal Date	12/15/2014
	Oper	ating Permit	Requiremen	t for Which	Deviations	Operating Permit Requirement for Which Deviations are Being Reported	orted	
ID Nimber		Term &		- Downlake		do: 6	50	
		Condition		regulatory	Type of	SO		
Unit ID	Group ID	No.	Pollutant	Kequirement	Requirement	t Index	Method	Frequency

TCEQ-10101 [04/09] Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.



AI/AI/CO 016066466273

454769 V.2

Phelps Dodge Refining Corporation
897 Hawkins Blvd., El Paso, TX 79915 • (915) 782-7301 • FAX (915) 782-7789

CERTIFIED MAIL - ARTICLE NUMBER 7011 3500 0002 2423 6132 RETURN RECEIPT REQUESTED

June 13, 2014

RECEIVE

JUN 1 6 2014

US EPA, Region 6 Air Enforcement 6EN-A 1445 Ross Ave, Ste. 1200 Dallas, Texas 75202 Air/Toxics & Inspection Coordination Branc 6EN-A

Re:

Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill

Account No. EE-0067-L

Title V Operating Permit No. O-1602

RN: RN100226000 CN: CN600132187

Annual Compliance Certification - May 18, 2013, through May 17, 2014

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Annual Compliance Certification (PCC) for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not hesitate to call me at (915) 782-7353.

Sincerely,

Rajesh Bhakta

Sr. Environmental Engineer

Kapil Blube

Enclosures:

Annual Compliance Certification (PCC) - May 2013, through May 2014

Form OP-CR01



Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMAT	TON			
RN: 100226000	CN: 60	00132187	I	Account No.: EE-0067-L
Permit No.: O1602			Project No.: 1602	
Area Name: El Paso Refinery and Ro	d Mill		Company Name: Phel	ps Dodge Refining Corporation
II. CERTIFICATION TYPE (Ple	ease m	ark the a	ppropriate box)	
⊠ Responsible Official			☐ Duly Authorized	Representative
III. SUBMITTAL TYPE (Please 1	nark tl	he approp	oriate box) (Only one r	response can be accepted per form)
SOP/TOP Initial Permit Applicati	on	Updat	e to Permit Application	n
GOP Initial Permit Application		🗌 Permi	t Revision, Renewal, o	r Reopening
Other: <u>Semi Annual Deviation R</u>	eport a	nd Annu	al Compliance Certifica	ation
IV. CERTIFICATION OF TRUT	Ή			
This certification does not exterinformation for reference only.	nd to i	nformat		e=
I, <u>John P. Quinn</u> (Certifier Name printed	or tup	ed)	certify that I an	(RO or DAR)
and that, based on information and be dated during the time period or on the Note: Enter EITHER a Time Period completed. The certification is not very	oelief for ne spec OR Sp	ormed aft ific date(s ecific Dat	s) below, are true, accu te(s) for each certificat	the statements and information rate, and complete:
	ına wn	тош аос	umentation date(s).	
Time Period: From	ate Da	to	to	End Date
Specific Dates: 11/18/13-5/17/12 Compliance Certification)	ı (Sen	ni Annua	nl Deviation Report)) 5/18/13-5/17/14 (Annual
Signature: John P. C	un	in	Signatu	re Date: 6/13/14
Title: General Manager				



Texas Commission on Environmental Quality Federal Operating Permit Form Permit Compliance Certification – PCC (Part 1)

Permit Holder Name	Phelps Dodge Refining Corporation	Customer Number	CN600132179
Area Name	El Paso Refinery and Rod Mill	Account Number	EE-0067-L
Operating Permit Number	O - 1602	Report Submittal Date	6/13/2014
Certification Period Start Date	5/18/2013	End Date	5/17/2014

I. Certification of Continuous Compliance with Permit Terms and Conditions	Resp	onse:
(Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	\boxtimes	

l. Su	mmary of Deviations	Resp	onse:
ndica uestic	te response by placing a 'x' in the appropriate column for each of the following ons)	Yes	No
A.	Were there any deviations from any permit requirements during the Certification Period that have <i>previously</i> been reported to the agency? If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal. Important Note: If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.		
B.	Were there any deviations from any terms or conditions of the permit during the Certification Period that are <i>currently</i> being submitted to the agency? If the answer to this question is 'Yes', please include the relevant reports along with this page.		\boxtimes

TCEQ-10490 [06/08] Page 1 of 1 Form PCC: This form for use by Federal Operating Permit holders and may be revised periodically.



Texas Commission on Environmental Quality Federal Operating Permit Deviation Report Form Form Dev Rep (Part 1)

Phelps Dodge h	efining Corpor	ation		Customer Number	CN600132179
Phelps Dodge	El Paso Opera	tions		Account Number	EE-0067-L
5/18/2013 Report Period End Date	5/17/2014	Operating Pour Number	ermit 01602	Report Submittal D	06/13/2014 ate
			The second secon	NOCESTICAL STATES OF STATE	
Operating Perm	it Requiremen	Operating Permit Requirement for Which Deviations	ations are Bei	ng Reported	
Operating Perm Term &	it Requiremen	t for Which Devi	viations are Bei	are Being Reported SOP or GOP Monitoring	orina Monitorina
	9	<u> </u>	Phelps Dodge Refining Corporation Phelps Dodge El Paso Operations Report 5/17/2014 Period End Date	Phelps Dodge Refining Corporation Phelps Dodge El Paso Operations Report 5/17/2014 Operating Permit Period End Date End Date Period	Phelps Dodge Refining Corporation Phelps Dodge El Paso Operations Report Period Period End Date Phelps Dodge El Paso Operations Operating Permit O1602

☐ YES NO	Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?	Is there a Part 3 Miscelland	0	Total Deviations:	Total D				
	Deviation Situation	Cause of Deviation	Dev	Time	Date	Date Time	Da		
edy or Mitigat	Corrective Action Taken to Remedy or Mitigate		No. of	riod End	Deviation Period	Devi	- 0	Incident No.	Item No.



110000 66273 TX 144

Phelps Dodge Refining Corporation-El Paso Refinery and Rod Mill | 897 Hawkins Blvd., El Paso, TX 79915 • (915) 782-7301 • FAX (915) 782-7789

1/013

CERTIFIED MAIL - ARTICLE NUMBER 7016 3560 0000 4010 8191 RETURN RECEIPT REQUESTED

December 15, 2017

AL/AL/CO

US EPA, Region 6 Air Enforcement 6EN-A 1445 Ross Ave, Ste. 1200 Dallas, Texas 75202

Re:

Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill

Account No. EE-0067-L

Title V Operating Permit No. O-1602

RN: RN100226000 CN: CN600132187

Semi-Annual Deviation Report - May 18, 2017, through November 17, 2017

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Annual Compliance Certification (PCC) for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not hesitate to call me at (915) 782-7353.

Sincerely,

Rajesh Bhakta

Sr. Environmental Engineer

Raji Blut

Enclosures:

Semi-Annual Deviation Report - May 2017 through November 2017

Form OP-CR01

Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. Identifying Information				
RN: 100226000	CN: 600132187		Account No.: EE-006	7-L
Permit No.: O-1602		Project No.: 1602		
Area Name: El Paso Refinery and Rod	Mill	Company Name: Phel	ps Dodge Refining Co	rporation
II. Certification Type (Please mark	the appropriate b	ox)		
Responsible Official		☐ Duly Authorized	Representative	
III. Submittal Type (Please mark the	appropriate box)	(Only one response ca	n be accepted per form,)
SOP/TOP Initial Permit Application	☐ Update	to Permit Application		
GOP Initial Permit Application	Permit	Revision, Renewal, or	Reopening	
Other: Semi-Annual Deviation Repo	ort			
IV. Certification of Truth				
This certification does not extend to in only. I, John P. Quinn	formation which	certify that I am		for reference
(Certifier Name printed or	typed)	corniy macran	(RO or DA	(R)
and that, based on information and belief the time period or on the specific date(s) Note: Enter Either a Time Period OR Sp certification is not valid without documen	below, are true, a ecific Date(s) for	ccurate, and complete:		_
Time Period: From		to		
Sta	rt Date		End Date	
Specific Dates: 12-15-2017 Date 1	Date 2	Date 3 Date 4	Date 5	Date 6
	um	Signatur	re Date: 12-15-2017	
Title: General Manager				



Federal Operating Permit Deviation Report Form Form Dev Rep (Part 1) Texas Commission on Environmental Quality

Permit Holder Name		Phelps Dodge Corporation	u.				Customer	CN600132179
Area Name	Phelps Doc	Phelps Dodge El Paso Operations	perations				Account	EE-0067-1
Report Period Start Date	05/18/2017	Report Period End Date	11/17/2017		g Permit	01602	Number Report Submittal Date	12/15/2017
	Opera	ating Permit	Requireme	nt for Which	Deviations	Operating Permit Requirement for Which Deviations are Being Reported	orted	
ID Number		Term &		Regulatory	Tvne of	SOP or GOP	Monitorino	H
Unit ID	Group ID	No.	Pollutant	Requirement Citation	Requirement	Index	Method	Frequency
		ř?						

STEERS Deviatio	No. Start	Date Time				F
Deviation Period	End	Date Time				Total Deviations:
	No. of	Dev				.,
		Cause of Deviation	N/A – No Deviations were reported during this period.			Is there a Part 3 Miscellan for
	Corrective Action Taken to Remedy or Mitirate	Deviation Situation	N/A – No Deviations were reported during this period.			Is there a Part 3 Miscellaneous Monitoring/Credible Evidence

Page 1 of

Federal Operating Permit Deviation Report Form Texas Commission on Environmental Quality

Form Dev Rep (Part 2)
30 TAC Chapter 101 Non-Reportable Emission Events

Permit Holder Name		Phelps Dodge Corporation	r.				Customer	CN600132179
	Declare Ded	0 11					Too In the last	
Area Name	Prieips Dod	Prierps Dodge El Paso Operations	perations				Account	1 2002
							Number	T-/000-33
Report Period	05/18/2017	Report	11/17/2017		g Permit	01602	Report	12/15/2017
2111		End Date					Submittal Date	
	Opera	Operating Permit I	Requiremen	it for Which I	Deviations a	Requirement for Which Deviations are Being Reported	orted	
ID Number	nber	Term &		Regulatory	Type of	SOP or GOP	Monitoring	
Unit ID	Group ID	No.	Pollutant	Kequirement	Requirement	Index Number	Method	Frequency

	o Remedy or Mitigate	ituation	d during this period.			□ YES □ NO
	Corrective Action Taken to Remedy or Mitigate	Deviation Situation	N/A – No Deviations were reported during this period.			there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?
		Cause of Deviation	N/A – No Deviations were reported during this period.			Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?
	No. of	Dev				
p	End	Time				Total Deviations:
Deviation Period	_	Date				otal De
Deviation	Start	Time				_
	S	Date				
Dev Item	No.					

TCEQ-10101 [04/09] Form for use by Federal Operating Permit holders and may be revised periodically.

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Texas Commission on Environmental Quality Federal Operating Permit Deviation Report Form Form Dev Rep (Part 3) OPTIONAL

OPTIONAL Miscellaneous Monitoring and Credible Evidence Submittal

		T		T	
Additional Materials	attached? Y/N				
Monitoring/Evidence Results supporting Compliance Status					
Deviation Item Monitoring Method/ Evidence					
Deviation Item					



Phelps Dodge Refining Corporation 897 Hawkins Blvd., El Paso, TX 79915 • (915) 782-7301 • FAX (915) 782 7789 EIVE

CERTIFIED MAIL - ARTICLE NUMBER 7015 0640 0003 5826 8605 RETURN RECEIPT REQUESTED

JUN 2 0 2016

June 15, 2016

Air Toxics & Inspection Coordination Brand 6EN-A

US EPA, Region 6 Air Enforcement 6EN-A 1445 Ross Ave, Ste. 1200 Dallas, Texas 75202

TXD>>7397144 TX v.3

Re:

Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill

Account No. EE-0067-L

Title V Operating Permit No. O-1602

RN: RN100226000 CN: CN600132187

Annual Compliance Certification - May 18, 2015, through May 17, 2016

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Annual Compliance Certification (PCC) for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not hesitate to call me at (915) 782-7353.

Sincerely,

Rajesh Bhakta

Sr. Environmental Engineer

Rajn Blokk

Enclosures:

Annual Compliance Certification (PCC) - May 2015, through May 2016

Form OP-CR01



Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. IDENTIFYING INFORMAT	TON		
RN: 100226000	CN: 600132187		Account No.: EE-0067-L
Permit No.: O-1602		Project No.: 1602	
Area Name: El Paso Refinery and Roo	d Mill	Company Name: Phe	lps Dodge Refining Corporation
II. CERTIFICATION TYPE (Ple	ease mark the a	ppropriate box)	
Responsible Official		☐ Duly Authorized	Representative
III. SUBMITTAL TYPE (Please r	nark the approp	oriate box) (Only one	response can be accepted per form)
SOP/TOP Initial Permit Application	on 🔲 Updat	e to Permit Application	on
GOP Initial Permit Application	☐ Permi	t Revision, Renewal, o	or Reopening
Other: Semi Annual Deviation Re	eport and Annu	al Compliance Certific	ation
IV. CERTIFICATION OF TRUT	H		
This certification does not exteninformation for reference only. I, John P. Quinn	d to informat	ion which is design	RI E
(Certifier Name printed	or typed)	certify that I al	(RO or DAR)
and that, based on information and b dated during the time period or on th	elief formed afte e specific date(s	er reasonable inquiry, s) below, are true, accu	the statements and information arate, and complete:
Note: Enter EITHER a Time Period (completed. The certification is not va	OR Specific Dat lid without doc	e(s) for each certifica umentation date(s).	tion. This section must be
Time Period: From		to	
Sto	ite Date		End Date
Specific Dates: 11/18/15-5/17/16 Compliance Certification)	(Semi Annua	l Deviation Report) 5/18/15-5/17/16 (Annual
Signature: Ohic Oc	unn	Signatu	re Date: <u>June 15, 2016</u>
Title: General Manager			



Texas Commission on Environmental Quality Federal Operating Permit Deviation Report Form Form Dev Rep (Part 1)

Permit Holder Name		Phelps Dodge Corporation	on				Customer Number	CN600132179
Area Name	Phelps Do	Phelps Dodge El Paso Operations	perations				Account Number	EE-0067-L
Report Period Start Date	05/18/2015	Report Period End Date	05/17/2016		Operating Permit Number	01602	Report Submittal Date	06/15/2016
	Ope	Operating Permit Requirement for Which Deviations	Requiremen	nt for Which	Deviations	are Being Reported	orted	
ID Number	ber	Term &		Regulatory	Type of	SOP or GOP	Monitoring	Monitoring
Unit ID	Group ID	No.	Pollutalit	Citation	Requirement	nt Number	Method	
Shaft Furnace	RM EP01A	FOP	PM	NSR Permit	Permit	N/A	NSR Permit	it Permit
Fabric Filter		Special		#36726,	Standard		#36726,	requires daily
Baghouse		Condition 9		Special			Special	monitoring
(Furnace No. 2)				Condition 9			Condition 14	2000
				as defined				monitors
				by Special				continuously
				Condition				
				14				

Dev Item	No.		-					WAL-C								
STEERS Incident	No.		N/A					7800								
	S	Date	7/08/	2015										e in i		
Deviati	Start	Time	7/08/ 21:50													
Deviation Period		Date	7/08/	2015												
bd	End	Time	21:58						- D/s							
	No. of	Dev	_													
		Cause of Deviation	At approximately 21:50, the	differential pressure had	spiked slightly above 7	inches for a few seconds	during the 8 minute manual	cleaning cycle. Upon further	investigation, it was	determined that the draft set	point was fixed at 0.3.	Having the draft set at 0.3, in	conjunction with not having	the cleaning cycle on	Automatic caused the blower	to work of a movimum of 60
	Corrective Action Taken to Remedy or Mitigate	Deviation Situation	Installed automatic controls to set furnace to low fire if	the permit parameters approach limits. Also, installed	alarm to ensure that the automatic cleaning cycle is	engaged when operating.	CONT	Note: This Deviation was previously submitted on the	Semi-Annual deviation report dated December 15, 2015.							

TCEQ-10101 [04/09] Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

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AIR CO/RN100226000/RP

TCEQ-10101 [04/09] Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

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Federal Operating Permit Deviation Report Form Texas Commission on Environmental Quality Form Dev Rep (Part 3) OPTIONAL

Miscellaneous Monitoring and Credible Evidence Submittal

Deviation Item Number	Monitoring Method/ Evidence Reference	Monitoring/Evidence Results supporting Compliance Status	Additional Materials attached? Y/N
7	Furnace/RTO operational parameters	Pressure gauges are installed, calibrated and maintained to monitor and record the differential	Z
		pressure. The differential pressure is recorded on a daily basis to maintain compliance.	
2	Furnace/RTO operational	Pressure gauges are installed, calibrated and	Z
	parameters	maintained to monitor and record the differential	
		pressure. The differential pressure is recorded on a	
		daily basis to maintain compliance.	



Texas Commission on Environmental Quality Federal Operating Permit Form Permit Compliance Certification – PCC (Part 1)

Permit Holder Name	Phelps Dodge Refining Corporation	Customer Number	CN600132179
Area Name	El Paso Refinery and Rod Mill	Account Number	EE-0067-L
Operating Permit Number	O - 1602	Report Submittal Date	6/15/2016
Certification Period Start Date	5/18/2015	End Date	5/17/2016

I. Certification of Continuous Compliance with Permit Terms and Conditions	Resp	onse:
(Indicate response by placing a 'x' in the appropriate column for each of the following questions)	Yes	No
With the possible exception of those permit terms and conditions identified in the 'Summary of Deviations' found using, at a minimum, but not limited to, the continuous or intermittent compliance method data from monitoring, recordkeeping, reporting, or testing required by the permit and any other credible evidence or information, was the permit holder in continuous compliance with all the terms and conditions of the permit over the Certification Period?	\boxtimes	

I. Su	mmary of Deviations	Resp	onse:
Indicat	te response by placing a 'x' in the appropriate column for each of the following ons)	Yes	No
A.	Were there any deviations from any permit requirements during the Certification Period that have <i>previously</i> been reported to the agency? If the answer to this question is 'Yes', please complete and attach Part 2 to this submittal. Important Note: If previously submitted reports did not contain specific information on monitoring methods, frequency and the total number of deviations experienced over the entire certification period, then use form DevRep to provide that information.		
B.	Were there any deviations from any terms or conditions of the permit during the Certification Period that are <i>currently</i> being submitted to the agency? If the answer to this question is 'Yes', please include the relevant reports along with this page.		

TCEQ-10490 [08/12] Page 1 of 1 Form PCC: This form for use by Federal Operating Permit holders and may be revised periodically.



Texas Commission on Environmental Quality Federal Operating Permit Form PCC - Previous Deviation Reports (Part 2)

Permit Holder Name	Phelps Dodge Refining Corporation	Customer Number	CN600132179
Area Name	El Paso Refinery and Rod Mill	Account Number	EE-0067-L
Operating Permit Number	O - 1602	Report Submittal Date	6/15/2016
Certification Period Start Date	5/18/2015	End Date	5/17/2016

Identification of Deviation Reports Submitted During the Certification Period (Note: All reports must be certified to truth, accuracy, and completeness by the Responsible Official)

Report Date	Report Description (Name of unit, Name of Rule, Driver for report, etc)	Report Submitted To	Report Previously Certified? (Y/N)
12/15/15	Shaft Furnace Fabric Filter Baghouse (Furnace No. 2)	TCEQ, EPA	Y

TCEQ-10490 [08/12]

Page 1 of 3

Form PCC: This form for use by Federal Operating Permit holders and may be revised periodically.



Texas Commission on Environmental Quality Federal Operating Permit Form PCC – Monitoring Options Selected (Part 3)

Permit Holder Name	Phelps Dodge Refining Corporation	Customer Number	CN600132179
Area Name	El Paso Refinery and Rod Mill	Account Number	EE-0067-L
Operating Permit Number	0-1602	Report Submittal Date	6/15/2016
Certification Period Start Date 5/18/2015	5/18/2015	End Date	5/17/2016

Description/Comments		The draft set point was fixed at 0.3. Having the draft set at 0.3, in conjunction with not having the cleaning cycle on Automatic caused the blower to work at a maximum of 60 Hz (100%), thus causing the differential pressure to rise until the cleaning cycle was manually initiated. During this 8 minutes, no emission limits were exceeded because the damper closes during a cleaning cycle, thus not allowing emissions to enter the RTO. Installed automatic controls to set furnace to low fire if the permit parameters approach limits. Also, installed alarm to ensure that the automatic cleaning cycle is engaged when operating.
Dates	End	7/8/2015
Da	Beain	7/8/2015
Monitoring Option Used	Specific Citation	NSR Permit #36726, Special Condition 14
SOP or GOP Index	Number	₹ <u>X</u>
Pollutant		M
Regulatory Requirement (Rule or	Permit No.	NSR Permit #36726, Special Condition 9 as defined by Special Condition 14
ID Number	Group ID	
ID Nu	Unit ID	Shaft Furnace Fabric Filter Baghous e (Furnace No. 2)

AIR CO/ RN100226000/RP

A loose limit switch striker did not activate the baghouse module damper position, thus causing the main blower to ramp down speed and affecting the differential pressure. The limit switch was immediately inspected and securely fastened to ensure the functionality of the module damper position.			
7/8/2015 7/8/2015			
7/8/2015			
NSR Permit #36726, Special Condition 14			
N/A			
PM			
NSR Permit #36726, Special Condition 9 as defined by Special Condition 14			
RM EP01A			
Shaft Furnace Fabric Filter Baghous e (Furnace No. 2)			



110000464273

US EPA, DALLAS, TX
Phelps Dodge Refining Corporation-El Paso Refinery and Rod Mill ECTOR
897 Hawkins Blvd., El Paso, TX 79915 • (915) 782-7301 • FAX (915) 782-7789

16 DEC 19 PM 11: 06

CERTIFIED MAIL - ARTICLE NUMBER 7015 0640 0003 5826 8667 RETURN RECEIPT REQUESTED

COMPLIANCE ASSURANCE & ENFORCEMENT DIV.

December 14, 2016

AI/AI/CO

US EPA, Region 6 Air Enforcement 6EN-A 1445 Ross Ave, Ste. 1200 Dallas, Texas 75202

Re:

Phelps Dodge Refining Corporation, El Paso Refinery and Rod Mill

Account No. EE-0067-L

Title V Operating Permit No. O-1602

RN: RN100226000 CN: CN600132179

Semi-Annual Deviation Report - May 18, 2016, through November 17, 2016

To whom it may concern:

As required by the referenced Federal Operating Permit, Phelps Dodge El Paso Operations is enclosing the Semi-Annual Deviation Report for the respective period stated above, as well as a signed OP-CR01 form.

If you should have any questions or concerns, please do not he sitate to call me at (915) 782-7353.

Sincerely,

Rajesh Bhakta

Sr. Environmental Engineer

Kajir Bluk

Enclosures:

Semi-Annual Deviation Report - May 2016, through November 2016

Form OP-CR01



Form OP-CRO1 Certification by Responsible Official Federal Operating Permit Program

All initial permit application, revision, renewal, and reopening submittals requiring certification must be addressed using this form. Updates to site operating permit (SOP) and temporary operating permit (TOP) applications, other than public notice verification materials, must be certified prior to authorization of public notice or start of public announcement. Updates to general operating permit (GOP) applications must be certified prior to receiving an authorization to operate under a GOP.

I. I	DENTIFYING INFORMAT	TION		
RN: 10	0226000	CN: 600132179)	Account No.: EE-0067-L
Permit	No.: 01602		Project No.: 1602	•
Area N	ame: Phelps Dodge El Paso O	perations	Company Name: Ph	elps Dodge Corporation
II. C	CERTIFICATION TYPE (Ple	ease mark the a	ppropriate box)	
⊠ Res _I	ponsible Official		☐ Duly Authorize	d Representative
III. S	UBMITTAL TYPE (Please r	nark the approp	priate box) (Only one	e response can be accepted per form)
☐ SOP	P/TOP Initial Permit Applicati	on 🔲 Updat	e to Permit Applicati	on
☐ GOP	P Initial Permit Application	☐ Permi	t Revision, Renewal,	or Reopening
⊠ Othe	er: Semi Annual Deviation R	eport		
IV. C	ERTIFICATION OF TRUT	Ή		
inform	John P. Quinn (Certifier Name printed	or typed)	certify that I a	am the <u>RO</u> (RO or DAR)
dated di	t, based on information and buring the time period or on th	ellet formed afte le specific date(s	er reasonable inquiry s) below, are true, acc	y, the statements and information curate, and complete:
Note: E	Enter EITHER a Time Period ted. The certification is not va	OR Specific Dat	te(s) for each certific	1 2
Time Pe	eriod: From		to	
	Sto	art Date		End Date
Specific	Dates: 5/18/16- 11/17 Date 1		nal Deviation Report) Date 3 Date 4	
Signatuı	re: John P. C	Lumi	Signat	ure Date: 12/14/16
Title: G	eneral Manager			



Federal Operating Permit Deviation Report Form Form Dev Rep (Part 1) Texas Commission on Environmental Quality

Permit Holder Name	Phelps Do	Phelps Dodge Corporation	on				Customer Number	CN600132179
Area Name	Phelps Do	Phelps Dodge El Paso Operations	perations					EE-0067-L
Report Period Start Date	05/18/2016	Report Period End Date	11/17/2016		ng Permit	01602	Report Submittal Date	12/14/2016
	Oper	Operating Permit Requirement for Which Deviations	Requiremen	t for Which		are Being Reported	orted	
ID Number	ber	Condition	=	Regulatory	Type of	SOP or GOP		Monitorina
Unit ID	Group ID	No.	Pollutant	Citation	Requirement	Index	Method	Frequency
Gas Turbine	GRPTURB	FOP	N/A	NSR Permit	Permit	N/A	NSR Permit	Permit
(GT No 4)		Special		#20535,	Standard		#20535,	requires
(0, 140, 4)		Collation		Special			Special	average
				Condition 8			Condition 14	1 hourly
				as defined				monitoring
				by Special				C
				Condition				
				14				

				-		÷ 10-0					_		
										-		No.	Item
										N/A		No.	Incident
									41.07	3/07/	Date	St	
										18:00	Time	Start	Deviation
									2016	3/07/	Date	Е	Deviation Period
										19:00	Time	End	_
		3								_	Dev	No. of	
place if NOx levels elevate	if there was a NOx	during a personnel shift change. El Paso Operations	to human error and occurred	entry onto the form was due	the log sheet. The lack of	inadvertently not entered on	2016, at 1800 hours were	Data Solar #4 for March 7,	Monitoring System (PEMS)	The Predictive Emission	Cause of Deviation		
	electronically for backup purposes.	The PEMS electronic logging will be extended for greater than 30 days and such data will be archived	Section 1997 Annual Property 1	these records.	responsible employees and reiterated the importance of	El Paso Operations has discussed the situation with the		Department.	more frequently by Supervisor and Environmental	The PEMS daily logs will be reviewed for completeness	Deviation Situation	Corrective Action Taken to Remady or Missass	

TCEQ-10101 [04/09]
Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

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TCEQ-10101 [04/09] Form DevRep: This form for use by Federal Operating Permit holders and may be revised periodically.

Page ____ of _

lotal Deviations:				
ations: 1				
Is there a Part 3 Miscellaneous Monitoring/Credible Evidence form supporting this deviation report?			exceedance alarms were noted in the operator's logbook.	above permit limits. During this hour no NOx
Monitoring/Credible Evidence pporting this deviation report?				Alla COMMINIOGZZOGOGIAG
YES NO				00220000/NI



Federal Operating Permit Deviation Report Form Form Dev Rep (Part 3) Texas Commission on Environmental Quality OPTIONAL

Miscellaneous Monitoring and Credible Evidence Submittal

operational parameters atmospheric pressure, relative humidity turbine inlet temperature (T5), and ave water injection rate are recorded on an to maintain compliance.	Deviation Item Number	Monitoring Method/ Evidence Reference Solar Taurus Turbine	Monitoring/Evidence Results supporting Compliance Status The average hourly turbine inlet temperature
		operational parameters	The average hourly turbine inlet temperature, atmospheric pressure, relative humidity, power turbine inlet temperature (T5), and average hourly water injection rate are recorded on an hourly basis to maintain compliance.
			to manitalit compilative.